
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Martha Vassalle, et al.,	:	Case No. 3:11CV0096
Plaintiffs,	:	<u>And Related Cases:</u>
	:	Case No. 3:08CV1434
vs.	:	Case No. 3:10CV0091
Midland Funding, LLC, et al.,	:	<u>MOTION TO ADMIT DANIEL E.</u>
Defendants.	:	<u>BIRKHAUSER PRO HAC VICE</u>
	:	HON. DAVID A. KATZ
	:	
	:	
	:	

Reginald S. Jackson, Jr., and Adam S. Nightingale, counsel of record for objector Robert Clawson, respectfully move this Court for admission *pro hac vice* of Daniel E. Birkhaeuser.

Daniel E. Birkhaeuser was admitted to the California State Bar in 1988, and remains in good standing. His California Bar Number is 136646. Mr. Birkhaeuser is an attorney and partner with the law firm Bramson, Plutzik, Mahler & Birkhaeuser, LLP, 2125 Oak Grove Road,

Suite 120, Walnut Creek, California 94598, (925) 945-0200 (telephone), (925)945-8792 (facsimile), dbirkhaeuser@bramsonplutzik.com (email).

A copy of the Affidavit of Mr. Birkhaeuser is attached hereto as Exhibit A.

WHEREFORE, the undersigned respectfully ask the Court to admit Daniel E. Birkhaeuser *pro hac vice* for purposes of representing objector Robert Clawson in the above-captioned lawsuit.

Respectfully submitted,

By /s/ Adam S. Nightingale
Reginald S. Jackson, Jr. (0003558)
E-Mail: rjackson@cjc-law.com
Adam S. Nightingale (0079095)
E-Mail: anightingale@cjc-law.com
CONNELLY, JACKSON & COLLIER LLP
405 Madison Avenue, Suite 1600
Toledo, Ohio 43604
Telephone: (419) 243-2100
Facsimile: (419) 243-7119

Counsel for Robert Clawson

CERTIFICATION

This is to certify that a copy of the foregoing has been filed electronically this 1st day of June, 2011. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By /s/ Adam S. Nightingale
Counsel for Robert Clawson